

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LLC, ALAMEDA
RESEARCH LTD., FTX TRADING LTD.,
WEST REALM SHIRES, INC., and WEST
REALM SHIRES SERVICES, INC.,

Plaintiffs,

-against-

FTX DIGITAL MARKETS LTD., BRIAN C.
SIMMS, KEVIN G. CAMBRIDGE, and
PETER GREAVES, and J. DOES 1–20

Defendants.

Adv. Pro. No. 23-50145 (JTD)

**CERTIFICATION OF COUNSEL REGARDING *PROPOSED* ORDER PERMITTING
INTERVENTION BY THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

The undersigned counsel to the Official Committee of Unsecured Creditors appointed in the above-captioned chapter 11 cases (the “Committee”) hereby certifies as follows:

On March 19, 2023, Alameda Research LLC, Alameda Research Ltd., FTX Trading Ltd., West Realm Shires, Inc., and West Realm Shires Services, Inc. (collectively, the “Plaintiffs”) commenced the above-captioned adversary proceeding (the “Adversary

¹ The last four digits of Alameda Research LLC’s tax identification number is 4063. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

Proceeding”), against FTX Digital Markets, Ltd. (“FTX DM”) and Brian C. Simms KC, Kevin G. Cambridge and Peter Greaves, in their capacity as the joint provisional liquidators of FTX DM (collectively, the “Defendants”).

Subsequent to the commencement of the Adversary Proceeding, the Committee initiated discussions with the Plaintiffs and the Defendants regarding the Committee’s participation in the Adversary Proceeding as a party. The Committee informed the Plaintiffs and the Defendants that the Committee intended to move to intervene in the Adversary Proceeding. The Committee, the Plaintiffs and the Defendants (collectively, the “Parties”) have engaged in discussions regarding such intervention. In the interest of efficiency and judicial economy, the other Parties have agreed to permit the Committee to intervene in the Adversary Proceeding, without the need to file a formal motion to intervene, pursuant to the terms of the proposed form of order attached hereto as **Exhibit A** (the “Proposed Order”).

As the Parties have consented to entry of the Proposed Order, the Committee respectfully requests that the Court enter the Proposed Order without further notice or a hearing at the Court’s earliest convenience.

Dated: June 23, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Robert F. Poppiti, Jr.

Matthew B. Lunn (No. 4119)

Robert F. Poppiti, Jr. (No. 5052)

1000 North King Street

Wilmington, DE 19801

Telephone: (302) 571-6600

Facsimile: (302) 571-1253

Email: mlunn@ycst.com

rpoppiti@ycst.com

-and-

PAUL HASTINGS LLP

Kristopher M. Hansen*

Kenneth Pasquale*

Erez E. Gilad*

Gabriel E. Sasson*

Isaac S. Sasson*

200 Park Avenue

New York, NY 10166

Telephone: (212) 318-6000

Facsimile: (212) 319-4090

Email: krishansen@paulhastings.com

kenpasquale@paulhastings.com

erezgilad@paulhastings.com

gabesasson@paulhastings.com

isaacsasson@paulhastings.com

** Admitted pro hac vice*

*Counsel to the Official Committee
of Unsecured Creditors*

EXHIBIT A

Proposed Order

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FTX DIGITAL MARKETS LTD., BRIAN C.
SIMMS, KEVIN G. CAMBRIDGE, and
PETER GREAVES, and J. DOES 1–20

Defendants.

Adv. Pro. No. 23-50145 (JTD)

**ORDER PERMITTING INTERVENTION
BY THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Upon the request of the Official Committee of Unsecured Creditors of FTX Trading Ltd, *et al.* (the “Committee”) for entry of an order, pursuant to section 1109(b) of title 11 of the United States Code and Rule 24 of the Federal Rules of Civil Procedure, made applicable to the above-captioned adversary proceeding (the “Adversary Proceeding”) by Rule 7024 of the Federal Rules of Bankruptcy Procedure, permitting the Committee to intervene as a Plaintiff in the

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Adversary Proceeding; and all parties to the Adversary Proceeding having consented to the Committee's intervention in the Adversary Proceeding on the terms set forth in this Order; and the Court finding that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having determined that the relief requested is appropriate and that no other or further notice of the relief provided for herein is necessary under the circumstances;

IT IS HEREBY ORDERED THAT:

1. The Committee is permitted to intervene as a Plaintiff in the Adversary Proceeding, and shall be deemed to have so intervened and to have adopted the Amended Complaint, dated June 14, 2023 [Adv. Dkt. No. 18], as if separately filed and served upon Defendants by the Committee.
2. The Committee shall coordinate with the other Plaintiffs to minimize duplication of efforts in connection with the Adversary Proceeding as the Committee reasonably deems practical under the circumstances, including with respect to the service of discovery requests.
3. This Order shall become effective immediately upon its entry.
4. This Court shall retain jurisdiction over any and all matters arising from or related to the implementation or interpretation of this Order, including with respect to the requirements of paragraph 2.